

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION**

MELISSA BROWN, individually and)
On behalf of those similarly situated,)

Plaintiff,)

v.)

1888 MILLS, LLC,)

Defendant.)

Civil Action File No. 3:20-cv-00224-TCB

JOINT MOTION TO STAY AND MEMORANDUM IN SUPPORT

COMES NOW, Defendant 1888 Mills, LLC and Plaintiff Melissa Brown, on behalf of herself and all those similarly situated (collectively, the “Parties”), hereby jointly move for an order staying all proceedings and discovery in this action pending the Court’s resolution of either Defendant’s Motion for Summary Judgment (Doc. 29) or Plaintiff’s Motion for Conditional Certification. (Doc. 31.) The discovery period is currently set to expire on October 25, 2021. Under these circumstances, the most efficient and economical way for this case to proceed would be for all discovery to be stayed pending the Court’s resolution of either of the above motions. Once the Court rules on one of the above motions, discovery can resume for the remaining period of discovery that has not yet expired. Accordingly, the Parties respectfully request that all proceedings and discovery in this action be

stayed, pending resolution of either Defendant's Motion for Summary Judgment or Plaintiff's Motion for Conditional Certification. A proposed Order is attached for the Court's convenience.

Respectfully submitted, this 20th day of October, 2021.

Respectfully submitted,

s/ James M. McCabe

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s/ Joyce M. Mocek

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Counsel for Defendant

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), I hereby certify that the foregoing **JOINT MOTION TO STAY** has been prepared in compliance with Local Rule 5.1(B) in 14-point Times New Roman type face.

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MELISSA BROWN,)	
)	
Plaintiff,)	
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v.)	Civil Action File No.
)	3:20-CV-00224-TCB
1888 MILLS, LLC.)	
)	
Defendant.)	

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically submitted the foregoing **JOINT MOTION TO STAY** to the Clerk of Court using the CM/ECF system which will automatically send electronic mail notification of such filing to counsel of record who are CM/ECF participants. Counsel of record are:

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This 20th day of October, 2021.

s/ Joyce M. Mocek

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